

UNDERGROUND STORAGE TANK CLOSURE REPORT

SITE LOCATION:

Norfolk Western Railway
Maintenance Facility

SITE ADDRESS:

5031 Baker Lot
Old Walkertown Road
Winston-Salem, North Carolina

TANK NUMBER(S)

013-01IM; 013-02IM; 013-03IM

CLIENT:

Norfolk Southern Corporation
8 North Jefferson Street
Roanoke, Virginia 24042

CONTRACT NUMBER:

SC8989

PREPARED BY:

Environmental Technology, Inc.
3705 Saunders Avenue
Richmond, Virginia 23227

Table of Contents

1.0	INTRODUCTION	1
2.0	SITE DESCRIPTION	1
2.1	Nature of Stored Substances	1
2.2	Type of Backfill	1
2.3	Depth to Groundwater	3
3.0	OTHER FACTORS FOR IDENTIFYING THE PRESENCE OF A RELEASE	3
4.0	SITE MAP	3
5.0	SAMPLING AND CHEMICAL ANALYSIS	3
5.1	Sample Method	3
5.2	Sample Locations	4
5.3	Analytical Method	4
5.4	Analytical Results	4
6.0	CONCLUSIONS AND RECOMMENDATIONS	6

Figures

Figure 1:	Site Sketch	2
Figure 2:	Sample Location Map	5

Tables

Table I:	Analytical Results for USTs	6
----------	-----------------------------------	---

Appendices

Appendix A:	Certificate of UST Destruction
Appendix B:	Analytical Results
Appendix C:	EPA Form 7530
Appendix D:	Site Safety Plan
Appendix E:	Removal Permits
Appendix F:	Photographic Documentation

1.0 INTRODUCTION

Environmental Technology, Incorporated (ETI) was contracted by Norfolk Southern Corporation (Service Order SC 8989) to permanently close several underground storage tanks (USTs) at the Norfolk Western Railway facility (Baker lot) located at Old Walkertown Road, Winston-Salem, North Carolina. Closure was performed by mechanical removal of the USTs. Soil samples were obtained from the UST excavations, sent to an approved ETI laboratory, and analyzed for total petroleum Hydrocarbons (TPH) according to North Carolina Department of Environment, Health, and Natural Resources, Division of Environmental Management. California GC Method with SW-846 Method 5030 as sample preparation was used to analyze the samples. The USTs were evacuated of all liquids, cleaned, transported, and disposed of at a metal recycler.

2.0 SITE DESCRIPTION

The railroad yard was an automobile shipping depot for transferring cars shipped by rail to on-road car carriers. The site is currently idle but contains one large building (approximately 60' X 80') with bay doors, office space, sunken pit for working on cars, and space for servicing car carriers. The entire site is enclosed by an eight foot high barbed wire and chain link fence and the ground surface is paved with asphalt. The parking lot to the west of the building is approximately a quarter mile long and 400 to 500 feet wide. Figure 1 is the general site diagram. This facility contained three existing USTs for closure. These USTs were located around the garage building. The following locations with respect to the building and sizes are as follows:

<u>UST LOCATION</u>	<u>NSID#</u>	<u>UST SIZE</u>
West side of Bldg.	013-01IM	10,000 Gallon
North side of Bldg.	013-02IM	3,000 Gallon
East side of Bldg.	013-03IM	500 Gallon

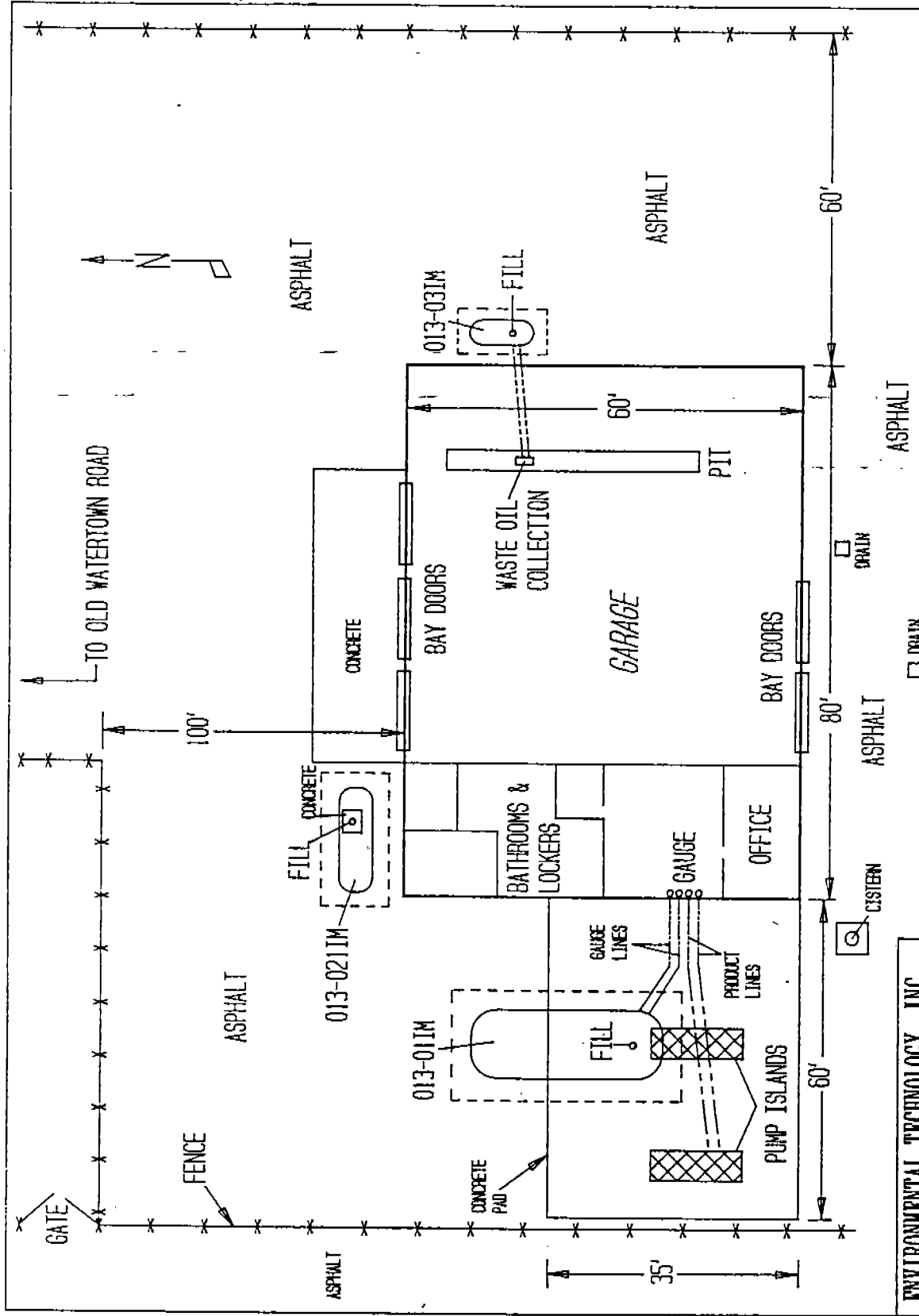
2.1 Nature of Stored Substances

The following is a list of the regulated substances contained within the USTs:

<u>UST#(NSID)</u>	<u>FORMER CONTENTS</u>
013-01IM	Diesel
013-02IM	Heating Oil
013-03IM	Used Oil

2.2 Type of Backfill

The original backfill consisted of the material excavated during the UST installation process. The material primarily consisted of a reddish brown sandy clayey silt and lean clay. This material is not a recommend-



ENVIRONMENTAL TECHNOLOGY, INC.

Title: GENERAL SITE DIAGRAM

FIGURE: 1

SCALE: SEE DRAWING FOR MEASUREMENTS

Site Address: OLD WALKERTOWN ROAD, WINSTON SALEM, NC.

Job #: 679

DATE: 11-15-90

DRAWN BY: M L J

ed fill for the purpose of a proper UST installation according to modern standards. Although the 10,000 gallon diesel tank and the 3,000 gallon heating oil tank appeared to be in good shape, the 500 gallon used oil tank show signs of corrosion.

The UST excavations were filled with the original fill material in all excavations which were not contaminated. Crushed stone was used to fill the void area caused by the UST removal, or in all excavations where contamination was present in the original fill.

2.3 Depth to Groundwater

The unconfined groundwater table was not intersected during any of the excavation process. The depth to this water table is believed to be approximately 20 to 25 feet. There was not any evidence of a perched water table as seen from the excavations. The maximum depth of any excavation was approximately 10 feet. The average depth of the UST excavations was 8 feet.

3.0 OTHER FACTORS FOR IDENTIFYING THE PRESENCE OF A RELEASE

No leak detection or monitoring practices were performed as detailed in the proposed regulations 15A NCAC 2N, Section 40 CFR 280.72.

4.0 SITE MAP

The site map is attached as Figure 1. This map shows related buildings, USTs, ancillary piping, and other land marks. Figure 2 shows the sample locations.

5.0 SAMPLING AND CHEMICAL ANALYSIS

Soil samples were taken by an approved ETI scientist on-site. The soil samples were labeled, preserved and sent to an ETI approved laboratory for chemical analysis. Since the water table was not intersected, no groundwater samples were collected.

5.1 Sample Method

Soil samples were collected by an approved ETI scientist wearing disposable latex gloves from a depth of a minimum of one foot below the bottom of each UST. These samples were taken from the bucket of the excavating equipment from an undisturbed section of soil using a disposable spatula. The samples were placed in clean baked glass containers, labeled and preserved on ice. A second sample was also taken at the time of the original sampling for the purpose of performing field analysis.

The field analysis consisted of placing the sample in a sealed glass container and allowing the sample to equilibrate to a temperature of approximately 70 degrees fahrenheit. The seal was then broken by the probe of a Foxboro Organic Vapor Analyzer (OVA), and a head space sample drawn into the OVA. The vapor was analyzed to supply a parts per million (ppm) reading of total organic vapor. This reading was correlated to the North Carolina action level of contamination which is typically a concentration of 100 ppm total petroleum hydrocarbons (TPH). A range of 20-40 ppm organic vapor (reported from the OVA) was used to discriminate samples as being suspected to contain hydrocarbon contamination. This range was used as a conservative field measurement for screening samples as determined from experience with this type of screening method.

There is no actual proven concentration of organic vapor (as determined by the OVA readings) to directly correlate with specific concentrations of TPH in soil.

5.2 Sample Locations

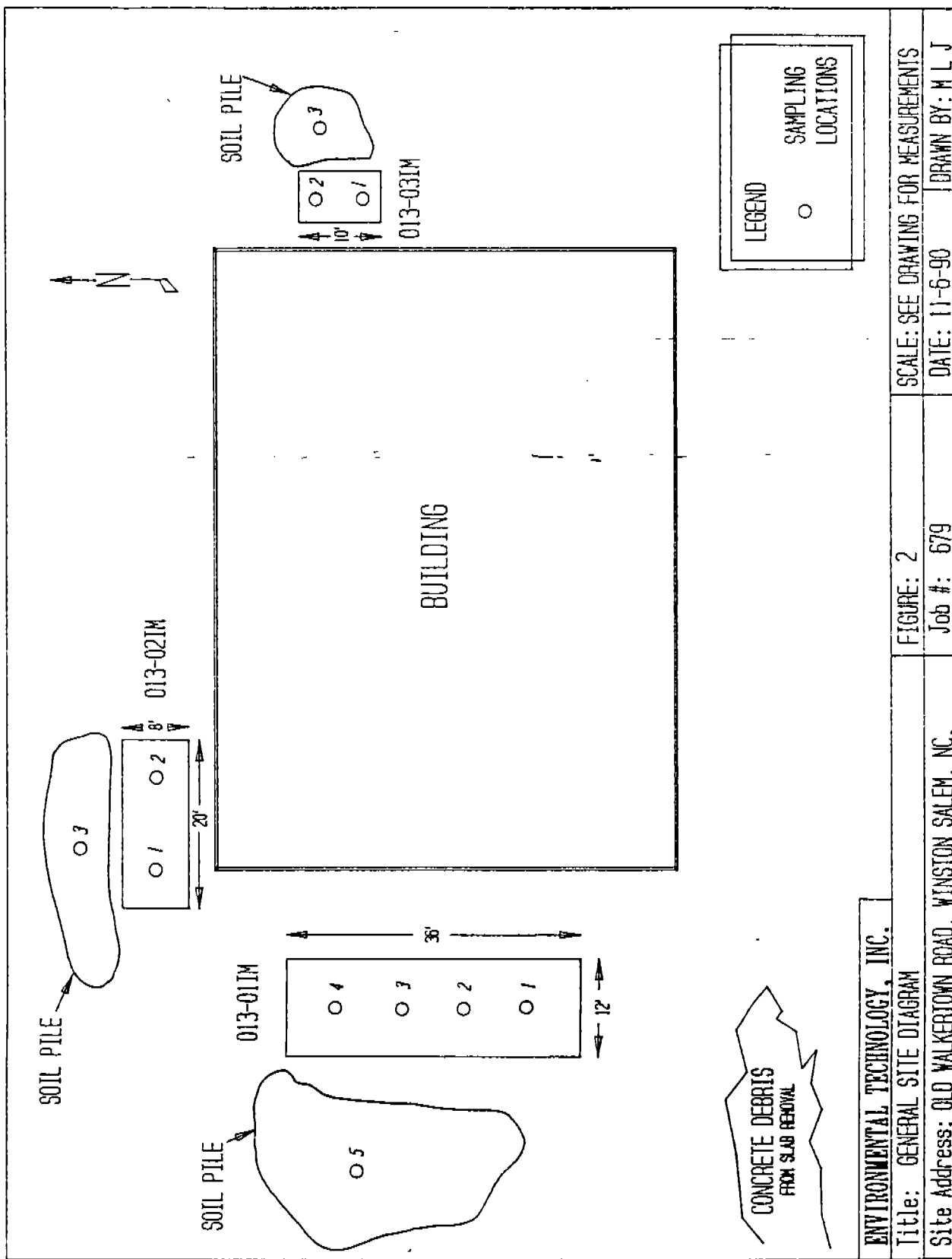
Representative soil samples were taken from each of the UST excavations. Two samples were taken from the 500 gallon used oil tank and the 3,000 gallon heating oil tank. Four samples were taken from the 10,000 gallon diesel tank. These samples were taken from each end of the UST or along the centerline of the tank respectively. Composite samples were also taken from the soil removed during excavation. These sample locations are indicated on Figure 2.

5.3 Analytical Method

The soil samples were sent to an ETI approved laboratory for chemical analysis. The method of chemical analysis used to test for concentrations of TPH was EPA Method 418.1 (according to EPA SW 846 Method 5030).

5.4 Analytical Results

The analytical results are attached as Appendix B and summarized in Table 1. The majority of the samples did not show levels of contamination to exceed the North Carolina Department of Environment, Health, and Natural Resources, Division of Environmental Management typical action level of 10 ppm. However, four samples analyzed had concentration levels exceeding the North Carolina action limit. A grab sample below 013-01IM had a concentration level of 4,129 ppm TPH, the spoil pile for the excavation of 013-02IM had a concentration level of 244 ppm TPH, the soil pile for tank excavation 013-01IM had a concentration of 22.8 ppm TPH, and the soil below tank 013-01IM had a concentration level of 18.6 ppm TPH.



ENVIRONMENTAL TECHNOLOGY, INC.

Title: GENERAL SITE DIAGRAM

FIGURE: 2

SCALE: SEE DRAWING FOR MEASUREMENTS

Site Address: OLD WALKERTOWN ROAD, WINSTON SALEM, NC.

Job #: 679

DATE: 11-6-90

DRAWN BY: M L J

Table I: Analytical Results for USTs

USTs #013-01IM, #013-02IM, and #013-03IM

UST Location: Old Walkertown Road, Winston-Salem, NC

<u>Sample #</u>	<u>Date Sampled</u>	<u>Results (mg/kg)</u>	<u>Method</u>
909141	10/4/90	4,129	TPH (Cal. Method)
909142	10/4/90	<10.0	TPH (Cal. Method)
909143	10/4/90	18.6	TPH (Cal. Method)
909144	10/4/90	<10.0	TPH (Cal. Method)
909145	10/4/90	22.8	TPH (Cal. Method)
909147	10/4/90	<10.0	TPH (Cal. Method)
909148	10/4/90	<10.0	TPH (Cal. Method)
909149	10/4/90	244	TPH (Cal. Method)
909151	10/4/90	<10.0	TPH (Cal. Method)
909152	10/4/90	<10.0	TPH (Cal. Method)
909153	10/4/90	<10.0	TPH (Cal. Method)

6.0 CONCLUSIONS AND RECOMMENDATIONS

Three USTs were removed from the Norfolk Western Railway property, Baker lot, in Winston-Salem, North Carolina. These USTs were not in service at the time of removal.

The soil below two USTs, 013-01IM and 013-02IM, showed signs of contamination exceeding the North Carolina typical action level of 10 ppm TPH. This should be reported as a confirmed release to the North Carolina Department of Environment, Health, and Natural Resources, Division of Environmental Management as required by the Underground Storage Tanks. These releases should be investigated. The contaminated soil excavated from the aforementioned tank sites should be remediated on-site using enhanced biodegradation methods until the concentrations of contamination are reduced to a level that will allow this material to be used as clean backfill on the site.

All contaminated material has been moved to a centralized location on the site. This material has been placed on plastic and nutrients added to enhance naturally occurring bacterial activity. Soil samples will be taken once per month to monitor contaminant degradation until other actions are required, if any. A Site Sensitivity Evaluation was filled out and permission was given by the regional North Carolina Division of Environmental Management for closure.

Appendix A:

Certificate of UST Destruction

NATIONWIDE TANK AND ENVIRONMENTAL SERVICES, INC.,
7200 Killingdeer Ln.
Charlotte, NC 28226
Phone: 704-542-3077

CERTIFICATE OF DISPOSAL

CERTIFICATE # 225 DATE 10/15/90

CONTRACTOR

Environmental Technology, Inc.
2104 Laburnam Ave.
Richmond, Va. 23227

LOCATION

Southern Railway Yard
Winston Salem, N. C.

TRANSPORTATION MILEAGE

TYPE OF TANK	SIZE	CONTENT IN GAL.	TANK ID #
* fuel	10,000 gallon		ET225A461
* fuel	3,000 gallon		ET225B462
* fuel	550 gallon		ET225C463
fuel	1,000 gallon		ET225D464
fuel	1,000 gallon		ET225E465
fuel	1,000 gallon		ET225F466

Nationwide Tank Service certifies that the above mentioned tanks have been properly disposed of and the contents and sludges processed in full compliance with the local, state, and federal regulations.

Nationwide Tank and Environmental Services, Inc.

John L. Boone

* Tanks @ this Site

Appendix B:
Analytical Results



Bionomics Laboratory, Inc.

4310 E. Anderson Road Orlando, Florida 32812 FDHRS Cert. No. 88008
(407) 851-2560 FAX (407) 856-0886

October 15, 1990

FOR: ENVIRONMENTAL TECHNOLOGY, INC.
3705 Saunders Ave.
Richmond, VA 23227

RECEIVED OCT 17 1990

ATTN: Eric Hiltner

RE: Sample(s) Received 10/8/90, Submitted By Client For Analysis.
NORFOLK & SOUTHERN/BAKER LOT-WINSTON-SALEM N.C. PROJECT # 679
P.O. # 0001843

LABORATORY REPORT

LAB I.D. NO.	MARKS:	DATE:	TOTAL RECOVERABLE PETROLEUM HYDROCARBONS: CALIFORNIA METHOD, mg/kg
909141	TANK 013-01 IM-1 SOIL BELOW TANK GRAB	10/4/90	4,129
909142	TANK 013-01 IM-2 SOIL BELOW TANK GRAB	10/4/90	< 10.0
909143	TANK 013-01 IM-3 SOIL BELOW TANK GRAB	10/4/90	18.6
909144	TANK 013-01 IM-4 SOIL BELOW TANK GRAB	10/4/90	< 10.0 ^{10K}
909145	TANK 013-01 IM-5 SPOILS PILE GRAB	10/4/90	22.8 [↑]
909147	TANK 013-02 IM-1 SOIL BELOW TANK GRAB	10/4/90	< 10.0
909148	TANK 013-02 IM-2 SOIL BELOW TANK GRAB	10/4/90	< 10.0
909149	TANK 013-02 IM-3 SPOILS PILE GRAB	10/4/90	244 *
909151	TANK 013-03 IM-1 SOIL BELOW TANK GRAB	10/4/90	< 10.0
909152	TANK 013-03 IM-2 SOIL BELOW TANK GRAB	10/4/90	< 10.0
909153	TANK 013-03 IM-3 SPOILS PILE GRAB	10/4/90	< 10.0

Signed

Mark Kromis
Mark Kromis, Chemist

Appendix C:

EPA Form 7530

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-86

FOR
TANKS
IN
NC

RETURN
COMPLETED
FORM
TO

Div. of Environmental Mgmt./GW Section
Dept. of Natural Resources & Comm. Development
P.O. Box 27687
Raleigh, NC 27611
(919)733-3221

I.D. Number
STATE USE ONLY
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—
(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances; and
(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel; and 2. industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:
1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mine-working, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of
continuation sheets
attached

1

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)

Norfolk Southern Corporation

Street Address

8 North Jefferson Street

County

Roanoke

City

Roanoke

State

VA

ZIP Code

24042-0078

Area Code

703

Phone Number

981-4154

Type of Owner (Mark all that apply)

☒ Current

☐ State or Local Gov't

☒ Private or Corporate

☐ Former

☐ Federal Gov't (GSA facility I.D. no. _____)

☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section I, mark box here ☐)

Facility Name or Company Site Identifier, as applicable

Norfolk & Western Railway Co.

Street Address or State Road, as applicable

(Baker lot) Old Walker town Rd.

County

Rensselaer

City (nearest)

Winston-Salem

State

NC

ZIP Code

27102

Indicate
number of
tanks at this
location

3

Mark box here if tank(s)
are located on land within
an Indian reservation or
on other Indian trust lands

☐

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here ☐)

J. D. Moser

Job Title

Area Code

(919)

Phone Number

724-4311

IV. TYPE OF NOTIFICATION

☒ Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

Signature

Date Signed

CONTINUE ON REVERSE SIDE

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No.	Tank No.	Tank No.	Tank No.	Tank No.
1. Status of Tank (Mark all that apply <input checked="" type="checkbox"/>) Currently in Use Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
2. Estimated Age (Years)	20 Yrs.	20 Yrs.	20 Yrs.		
3. Estimated Total Capacity (Gallons)	10,000	3,000	500		
4. Material of Construction (Mark one <input checked="" type="checkbox"/>) Steel Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify _____	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
5. Internal Protection (Mark all that apply <input checked="" type="checkbox"/>) Cathodic Protection Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify _____	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
6. External Protection (Mark all that apply <input checked="" type="checkbox"/>) Cathodic Protection Painted (e.g., asphaltic) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify _____	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7. Piping (Mark all that apply <input checked="" type="checkbox"/>) Bare Steel Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify _____	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply <input checked="" type="checkbox"/>) a. Empty b. Petroleum Diesel Kerosene Gasoline (including alcohol blends) Used Oil Other, Please Specify _____ c. Hazardous Substance Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No. Mark box <input checked="" type="checkbox"/> if tank stores a mixture of substances d. Unknown	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
9. Additional Information (for tanks permanently taken out of service) a. Estimated date last used (mo/yr) b. Estimated quantity of substance remaining (gal.) c. Mark box <input checked="" type="checkbox"/> if tank was filled with inert material (e.g., sand, concrete)	Pulled 10/3/90 1 <input type="checkbox"/>	10/3/90 1 <input type="checkbox"/>	10/3/90 1 <input type="checkbox"/>	1 <input type="checkbox"/>	1 <input type="checkbox"/>

Appendix D:
Site Safety Plan

ENVIRONMENTAL TECHNOLOGY, INC. (ETI)

General Safety Plan for Norfolk Southern (NS) Project

Since the potential exists for ETI personnel to work in a hazardous environment, it is of utmost importance that a general health and safety plan be developed and implemented during the NS project. The plan will contain health and safety information, instructions, and work procedures/practices designed to be clearly understood by all personnel working at the site. In the event of an emergency response or situation, however, personnel must rely on verbal instructions and existing standard operating procedures until a written plan is developed as time permits.

A. Minimum Requirements per 29 CFR 1910.120 (OSHA)

1. Names of key personnel.
2. Safety and health risk hazard analysis for the general site task.
3. Training requirements.
4. Personal protective equipment/level of protection.
5. Medical surveillance requirements.
6. If required, frequency and type of air monitoring, personnel monitoring, environmental sampling techniques and instrumentation.
7. Site control measures
8. Decontamination procedures
9. Emergency response plan
10. Confined space entry procedures, hot work permits, etc.

Other Information:

1. Maps and diagrams
2. History of site with records

3. Weather
4. Phone numbers
5. Safety plans for use of equipment
6. Hospital contacts

Underground Storage Tank Removal in Virginia and North Carolina

I. Statement of Hazard

A. General - ETI will perform removal of all "Permanently Out of Use" and 25 years or older underground storage tanks and contents located on NS property. ETI will comply with all federal, state, and local regulations regarding removal of tanks, sampling of soil, and closure of underground tank sites.

B. Specific Hazards - The greatest potential hazard on the NS job site will involve safety issues and concerns. ETI will adhere to all applicable current OSHA safety rules and provisions as outlined in the General Industry Standard 29 CFR 1910. In addition, personnel will be dressed in Level D protection during removal of the tanks. This protection will include as a minimum:

- hard hat
- safety shoes
- eye protection
- Tyvek coveralls/leather gloves

Emergency equipment on-site will include an eye-wash, first-aid kit, fire extinguisher, a source of oxygen and additional site-specific equipment as dictated by site conditions.

C. Miscellaneous - All chemicals used by ETI personnel will include a Material Safety Data Sheet (MSDS) which will summarize potential health hazard(s) and

outline proper handling, use, storage, etc. requirements.

ETI personnel will follow the company's heat stress policy when environmental conditions warrant a work/break schedule.

While the potential is minimal that confined space entry will be performed by ETI, if the situation arises, personnel will comply with the company's Confined Space Entry Program to assure safe and healthy work conditions.

II. Medical Surveillance/Training

All ETI personnel working at NS sites are enrolled in a medical surveillance program and have completed an OSHA 40-hour Hazardous Worker Training Program to comply with 29 CFR 1910.120. Records are available at ETI's corporate office in Richmond, Virginia.

III. Drug and Substance Abuse

ETI employees will comply with both the company's Drug and Substance Abuse Standard Operating Procedures (SOP) and the NS policy as outlined in their rule book, page 8G.

IV. Emergency Procedures

A. Emergency Notification - At each job site, the following local phone

numbers will be provided:

Fire Department - 911
Hospital & Map - 748-2011 Baptist Hospital
(Winston-Salem, NC)
Police Department - 911
Ambulance Service - 911
Poison Control Center - 748-4991 (Baptist Hosp.)
Client Contact - (703) 981-4155 Scott Kroll
ETI Contact - (804) 358-5400 Rusty Vanness
Subcontractor Contact - _____

B. Emergency Equipment -

C. Emergency Signal - A visual/audio signal will be used to recall personnel on the worksite if an emergency exists. This may involve radios, air horns, or hand signals. These emergency signals will be discussed at the site safety meeting.

D. Buddy System - A "buddy system" will be used by ETI to assure no employees are working alone in the field.

IV. General Safety

- A. Safety Official - Rusty Vanness will oversee the proper completion of safety functions at each NS site.
- B. Daily Safety Meeting - A short safety meeting will be conducted on a routine basis which will highlight key issues or concerns (i.e., work practices, hazards encountered, proper use of equipment, heat stress, electric hazards, etc.). A log will be maintained to document safety activities.
- C. Hazardous Gases/Chemicals - ETI will list hazardous materials on-site, their location, and the correct handling and storage requirements. Compressed gases (i.e., Nitrogen) will be properly tied down and isolated. ETI will follow requirements as outlined in the Chemical Hazards section of the Company's Health and Safety Manual.

Appendix E:
Removal Permits

NOT REQUIRED IN WINSTON-SALEM, NC

Appendix F:
Photographic Documentation

Photograph of USTs # 013-01IM, 013-02IM, and 013-03IM taken during the removal process at the Norfolk Western Railway Maintenance Facility in Winston-Salem, North Carolina



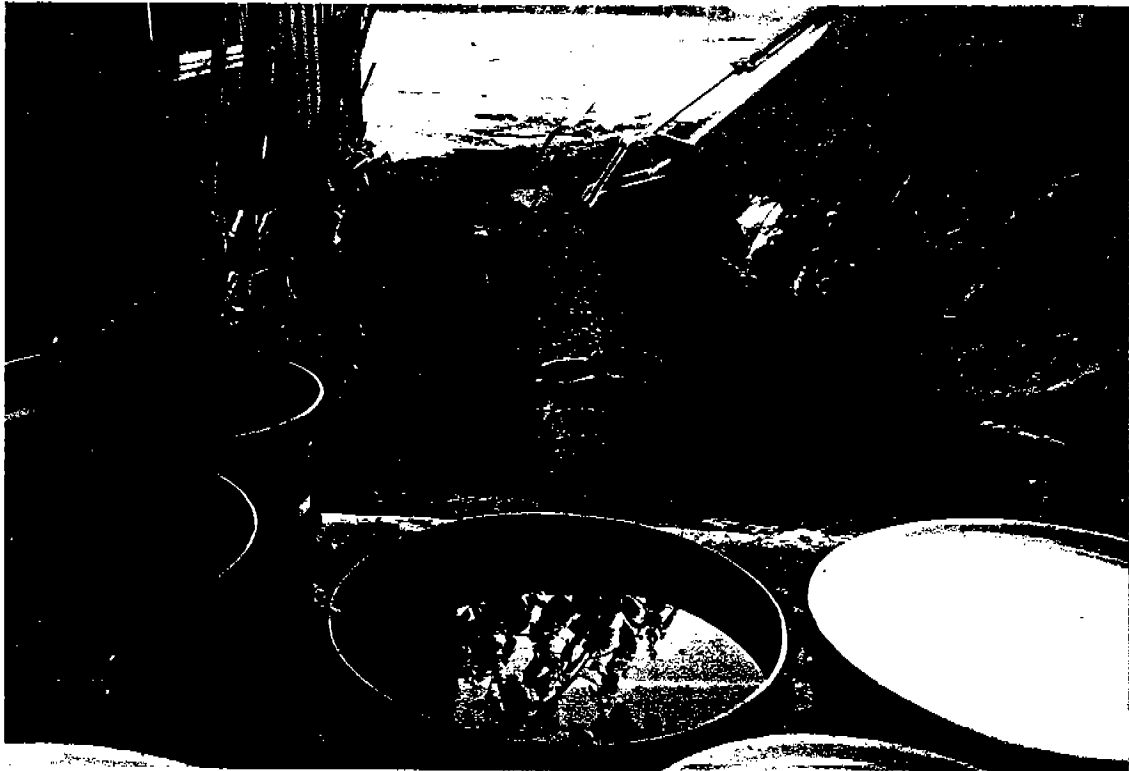
Photograph Number 1: 013-01IM UST area prior to removal



Photograph Number 2: 013-01IM UST removed and UST excavation



Photograph Number 3: 013-02IM UST prior to removal



Photograph Number 4: 013-02IM being removed with pumped product in drums



Photograph Number 5: 013-012IM UST removed



Photograph Number 6: 013-03IM UST prior to removal



Photograph Number 7: 013-03IM UST being excavated